

REMARKS

Applicants reply to the Examiner's comments in the Advisory Action mailed on October 3, 2006, and submit these amendments and remarks. Applicants request that the Examiner enter the above amendments and consider the following remarks prior to examining the above-referenced patent application after RCE. Claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, and 32 were pending in the application and the Examiner rejects claims 1-3, 5, 7-15, 17-22, 24-26, 28, 30, and 32. Applicants amend the certain claims and add new claim 33. Support for the amendments may be found in the originally-filed specification, claims, and figures. No new matter has been introduced by these amendments. Reconsideration of this application is respectfully requested.

Examiner Comments in the Advisory Action

Regarding Applicants' previously filed argument stating that claim 6 was not cancelled in a previous reply, the Examiner points out the relevant section of a Reply filed on June 30, 2006, wherein claim 6 was canceled in Applicants' remarks. Applicants acknowledge that claim 6 was previously canceled and have corrected the listing of claims to reflect the cancellation.

The Applicants' previously filed argument stated that the cited references fail to disclose selecting relevant offers according to offer data. However, the Examiner asserts that the combination of the cited references disclose, "providing target advertisements to users based on user psychographic profile information (internet viewing habits) (Gerace: Abstract, Claims 1-5), which is the equivalent to the technology/system requirements as claimed" (page 2, paragraph 3). The Examiner further notes that the claimed subject matter "does not require the saved information (answer database) to be unrelated (lack of relationship) to system users."

Applicants amended the claims to reflect the Examiner's suggestion and concerns about the existing claims to further clarify the saved information. In view of the amended independent claims, Applicants respectfully request the Examiner to reconsider the following arguments differentiating the Gerace from the present invention.

Gerace generally discloses a system for tracking user behaviors on the Internet in order to more accurately target marketing campaigns. Specifically, the Gerace system provides targeting of an advertising audience based on psychographic and/or behavioral profiles relating to Internet users. The Gerace system constructs a psychographic profile by recording computer activity and viewing habits of the user. Using the profile, with or without additional user demographics, advertisements are displayed to appropriately selected users. Through a process of regression

analysis of recorded responses of users viewing the advertisements, the target user profile is refined over a period of time to progressively provide more precise targeting.

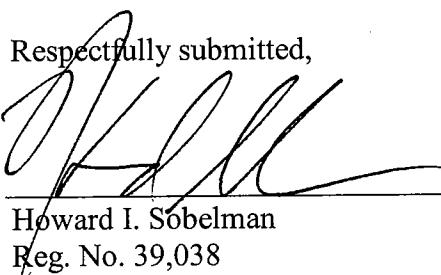
In order for the Gerace system to provide this level of targeted advertising, the system must collect and store information that is specific to each individual user. Gerace stores information regarding an identified user's psychographic and/or behavioral profiles within a user profile. This user profile is then used by the system to individually target advertisements to specific users. Importantly, the Gerace system requires the user to initiate a relationship with the system and then provide personal information (*see*, column 4, lines 29-57). Thus, Internet users who have not registered with the Gerace system and provide the necessary personal information are outside of the reach of the Internet use monitoring and targeted advertising features taught by Gerace. This is a significant limitation in that there is a growing population of Internet users who are concerned over Internet privacy, and the prospect of providing personal information to the advantage of advertisers, and to further agree to have their Internet usage monitored would likely be widely rejected. The Gerace system is unable to provide targeted advertising based on the culmination of data to users, whether or not they have used a particular Internet service. As such, Gerace does not disclose or suggest a destination expert server configured to at least, "compiling offer data regarding the most frequently requested destination on information stored in the answer database relating to a subset of customers, wherein the offer data is used to select an offer relevant to the offer data for presentation to the customer," as similarly recited by amended independent claims 1, 8, 13 and 20. Accordingly, neither Taufique, Lauffer, DeLorme, Gerace, nor any combination thereof, disclose or suggest a destination expert server configured to at least, "compiling offer data regarding the most frequently requested destination on information stored in the answer database relating to a subset of customers, wherein the offer data is used to select an offer relevant to the offer data for presentation to the customer," as similarly recited by amended independent claims 1, 8, 13 and 20.

Dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30 and 32 variously depend from independent claims 1, 8, 13 and 20. As such, dependent claims 2, 3, 5, 7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30 and 32 are allowable for at least the reasons described above with respect to independent claims 1, 8, 13 and 20, as well as in view of their own respective features.

New claim 33 is allowable for at least the reasons described above with respect to independent claim 1, as well as in view of its own respective features.

Applicants respectfully submit that the pending claims are in condition for allowance. No new matter is added in this Reply. Reconsideration of the application is thus requested. The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Examiner to telephone the undersigned, if the Examiner has any questions regarding this Reply or the present application in general.

Dated: December 19, 2006

Respectfully submitted,

By: _____

Howard I. Sobelman
Reg. No. 39,038

SNELL & WILMER L.L.P.
400 E. Van Buren
One Arizona Center
Phoenix, Arizona 85004
Phone: 602-382-6228
Fax: 602-382-6070
Email: hsobelman@swlaw.com